

# EXHIBIT A

**From:** [Lisa Machell](#)  
**To:** [Andrew H. DeNinno](#)  
**Cc:** [Nathan Tilden](#); [William Potter](#); [Ronald Chapman Sr.](#)  
**Subject:** Allstate Insurance Company, et al v. Southeast Michigan Surgical Hospital, LLC, et al Eastern District of Michigan Case Number: 2:22-cv-11684  
**Date:** Friday, June 7, 2024 10:49:21 AM  
**Attachments:** [image001.png](#)  
[image003.png](#)  
[2024-06-07 Defendant, SE, First RFP to Plaintiffs .pdf](#)

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Dear Attorney DeNinno:

Attached please find the Defendant, Southeast Michigan Surgical Hospital, LLC's, First Set of Request for Production directed to the Plaintiffs in the above-referenced matter.

Thank you.

Best,  
Lisa M. Machell

**LISA M. MACHELL** | Paralegal  
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